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FILE NO: 39426.000048

August 4, 2000

Donald Hesler, P.E.
Division of Environmental Remediation
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, NY 12233-7010

475230



Response of Honeywell International Inc. (formerly AlliedSignal Inc.)
to Supplemental Request for Information Concerning Honeywell's Facilities

Dear Mr. Hesler:

On behalf of Honeywell International Inc. ("Honeywell") (formerly AlliedSignal Inc.), we submit the enclosed response to the "Supplemental Request for Information Concerning Honeywell's Facilities in Onondaga County, New York" dated June 30, 2000 (the "Supplemental Request"). The enclosed response supplements the Onondaga Lake RI/FS Site History Report dated July 1992; AlliedSignal's response dated August 19, 1996, to the Joint Request for Information; AlliedSignal's response dated May 14, 1997, to the Joint Supplemental Request for Information; AlliedSignal's response dated April 22, 1999, to the Joint Request for Information Concerning Use and Disposal of PCBs; and Honeywell's response dated March 28, 2000, to the Supplemental Request for Information Concerning AlliedSignal's Facilities.

Honeywell's response addresses each of the questions set forth in the Supplemental Request. Honeywell submits the enclosed response to comply with its obligations under the Consent Decree between the State of New York and AlliedSignal, entered by the District Court for the Northern District of New York on March 17, 1992, and thereafter amended and supplemented, in particular paragraph 27 of the Decree. In accordance with paragraph 68 of the Decree, Honeywell is not obligated to respond to discovery requests, motions and requests for information in "other legal proceedings with respect to the nature and extent of contamination in the Onondaga Lake System," except as directed by the court. Consequently, Honeywell respectfully disagrees with the view expressed in the

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Supplemental Request that it is obligated pursuant to other legal authorities identified in the State's December 22, 1999 information request to respond to the Request.

Lastly, Honeywell continues to maintain that a certification of its responses to this and all previous Requests for Information is not required or authorized under CERCLA § 104(e) and would be superfluous. Indeed, as EPA and NYSDEQ previously have noted, 18 U.S.C. § 1001 and New York Penal Law §§ 175.30 and 175.35 already contain substantial penalties for providing false, fictitious or fraudulent statements or representations. Therefore, Honeywell has not provided a certification of its responses.

If you have any questions or comments about this letter or the enclosed response, please let Dan Jordanger or me know.

Sincerely,



Manning Gasch Jr.

Enclosures

cc: Mr. Robert Nunes (w/enclosures) ✓
Mr. James Vener (w/enclosures)
George A. Shanahan, Esquire (w/o enclosures)
Carol Conyers, Esquire (w/o enclosures)
Philip Bein, Esquire (w/o enclosures)
Mr. John Davis (w/o enclosures)
Gordon D. Quin, Esquire (w/enclosures)
Dan J. Jordanger, Esquire (w/enclosures)

**RESPONSES OF HONEYWELL INTERNATIONAL INC.
TO REQUEST FOR INFORMATION
OF JUNE 30, 2000**

Request Number 1

1. Provide a complete copy of the index of "Environmental Control Group Files." A copy of this index was previously provided to the Department under cover letter from Alfred Labuz dated June 8, 2000, but the copy is missing pages 1 and 5, and pages 7 through the end of the document (the copy we received is attached). This file index was attached to a document dated January 26, 1977, which had previously been designated by Honeywell as Document No. 1436 in the list of documents provided with Honeywell's first response (dated August 19, 1996) to the Joint Request for Information.

Response:

Honeywell has not been able to find a more complete copy of the requested index. Honeywell does believe, however, that it has a majority of the documents constituting the "Environmental Control Group Files," to which the index refers.

Request Number 2

2. Make available files contained in storage boxes 2 through 9 in Vault No. 10, as referenced in the index pages attached.

Response:

Honeywell will make available to NYSDEC for review, on or after August 18, 2000, all of the documents in Honeywell's possession that this request addresses. These documents will be available at or in the area of Honeywell's office at 6711 Towpath Road, East Syracuse, New York.

Request Number 3

3. Based on the Department's review of the complete index, make available additional files.

Response:

As appropriate under the circumstances as they arise, Honeywell will make available to NYSDEC for review those documents in Honeywell's possession that are responsive to a reasonable request for information on Honeywell's facilities and operations in Onondaga County, New York.